

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JULIE RHODES, individually and on)	
behalf of a class,)	
)	Case No.: 2007-CV-6385
Plaintiff,)	
)	Chief Judge James Holderman
vs.)	
)	Presiding Mag. Judge Morton Denlow
ROCKLER RETAIL GROUP, INC.,)	
doing business as ROCKLER)	
WOODWORKING AND)	
HARDWARE, and DOES 1-10,)	
)	
Defendants.)	

**AGREED MOTION FOR EXTENSION OF TIME TO
RESPOND TO COMPLAINT**

Defendant, Rockler Retail Group, Inc. ("Rockler"), by and through its undersigned counsel, respectfully submits this Agreed Motion for Extension of Time to Respond to Complaint, and in support thereof state as follows:

1. On or about November 9, 2007, Plaintiff, Julie Rhodes ("Plaintiff"), commenced this case by filing a Complaint alleging that Rockler violated the Fair and Accurate Credit Transactions Act, 15 U.S.C. § 1681, *et seq.*
2. On or about November 15, 2007, Rockler was served with Summons and the Complaint.
3. Thereafter, undersigned counsel was retained by Rockler on or about December 4, 2007, and counsel has commenced a preliminary investigation into the allegations set forth in the Complaint.
4. On motion by Rockler, this Court, on or about December 6, 2007, entered a Minute Order which, among other things, granted Rockler up to and including January 11, 2008 to respond to Plaintiff's Complaint. (*See* Docket Entries 16, 17 & 18.)

5. Counsel requires, however, a brief extension of time to more fully investigate this matter and respectfully requests that this Court grant Rockler up to and including February 4, 2008, to respond to the Complaint.

4. Plaintiff's counsel has agreed to the relief requested by this motion. Specifically, on December 27, 2007, Ms. Cassandra P. Miller, counsel for Plaintiff, agreed to an extension of time, up to and including February 4, 2008.

5. This is Rockler's second request for an extension of time to respond to Plaintiff's Complaint, and such request is not made for the purpose of delay. Rather, this motion is made in an attempt to secure sufficient time to adequately prepare a response to the Complaint.

WHEREFORE, Rockler respectfully requests that this Court enter an order:

- (i) granting Rockler additional time, up to and including February 4, 2008, to respond to Plaintiff's Complaint; and
- (ii) granting Rockler any additional relief that this Court deems just and equitable.

Dated: December 28, 2007

Respectfully submitted,

ROCKLER RETAIL GROUP, INC.

/s/ David S. Almeida

One of Its Attorneys

Gordon B. Nash, Jr.

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Attorneys for Rockler Retail Group, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on December 28, 2007, the foregoing **Agreed Motion for Extension of Time to Respond to Complaint** was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system. I further caused a copy of the foregoing to be sent via regular U.S. Mail to:

Daniel Edelman
Cathleen Combs
James Lattuner
Cassandra Miller
Edelman, Combs, Lattuner & Goodwin, LLC
120 South LaSalle Street, 18th Floor
Chicago, IL 60603

/s/ David S. Almeida